

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10288-RWZ

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UNITED STATES

v.

JOSEPH ALLEN

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**DEFENDANT’S REPLY TO GOVERNMENT’S RESPONSE TO DEFENDANT’S  
RENEWED MOTION TO REVOKE DETENTION ORDER BASED ON CHANGED  
CIRCUMSTANCES.**

In opposing the defendant’s motion, the government asserts that the defendant’s release “poses a significant and immediate threat to the safety of the government witnesses in this case.” Gov. Resp. at 3. In sole support thereof, the government recounts a recent assault upon Sara Ann Thompson, who is on the government’s witness list. The government presents absolutely no evidence (because none exists!) of any connection between Joseph Allen and this assault. Mr. Allen has been incarcerated since last September while awaiting trial. All of his telephone calls and correspondence are monitored. There is simply no justification for connecting him, by innuendo or otherwise, to this recent crime. The government’s attempt to muddy the waters by falsely suggesting the defendant’s involvement in this incident is reprehensible and should be firmly rejected by this Court.

Respectfully submitted,

**JOSEPH ALLEN**

By his attorneys,

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 31, 2006.

/s/ James L. Sultan  
James L. Sultan